

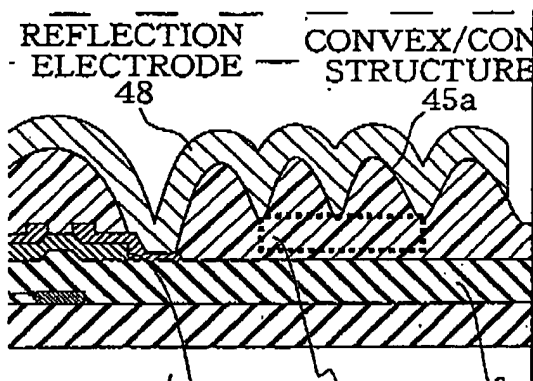
I)A) Independent Claims 1 and 16

Claims 1 and 16 recite, *inter alia*,

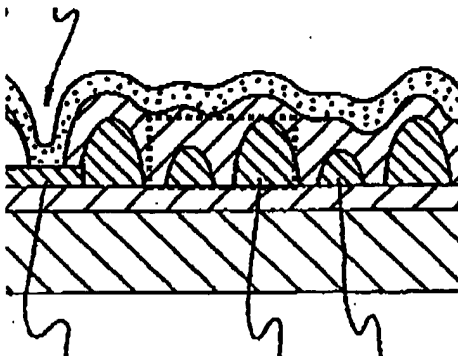
"... at least one portion of the insulation film is a single material that extends laterally along the second substrate under the entirety of at least two adjacent convex portions of the convex/concave structure, and

the at least one portion of the insulation film has, along its length, a generally constant thickness extending at least from an uppermost surface of the second substrate to a lowermost surface of a concave portion of the convex/concave structure located between the at least two adjacent convex portions."

An example of the "at least one portion" recited in claim 1 is shown below (in dotted lines).



A comparable portion of Nakamura's FIG. 17 is indicated below (in dotted lines).



Thus, Applicants believe that, while the "at least one portion" of the invention is of a single material in the defined region, the applied reference shows a two material insulator in the defined region.

I)B) Independent Claims 51 and 52

For the reasons discussed above, Applicants wish the Examiner to further explain how a two-layered structure can teach or suggest:

“the entire insulation film between said reflection electrode and said second substrate is a single-layered film made from a single material arranged in one step,” as recited in claim 53; or

“the entire insulation film between said reflection electrode and said second substrate is made from a single material arranged in a single step,” as recited in claim 54.

II Proposed Claim Amendment

Applicant proposes the following claim Amendment for discussion purposes only. A similar amendment could be made to claim 16.

1. (Currently Amended) A reflective liquid crystal display (LCD) apparatus comprising:
 - a transparent first substrate;
 - a transparent electrode arranged on the first substrate;
 - a second substrate;
 - a switching element arranged on the second substrate;
 - an insulation film arranged on the switching element and having a convex/concave structure;
 - a reflection electrode arranged on the insulating film along the convex/concave structure and connected to the switching element; and
 - a liquid crystal layer sandwiched between the transparent electrode of the first substrate and the reflection electrode of the second substrate; wherein
 - the insulation film protects the switching element;
 - the convex/concave structure is formed by irregular arrangement of regions having different thickness values; and
 - at least one portion of the insulation film is a single layer of a single material that extends laterally along the second substrate under the entirety of at least two adjacent convex portions of the convex/concave structure, and
 - the at least one portion of the insulation film has, along its length, a generally constant thickness extending at least from an uppermost surface of the second substrate to a lowermost surface of a concave portion of the convex/concave structure located between the at least two adjacent convex portions.